

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

: NO: 2:13-CR-00421

VS.

Fatmir MUSTAFARAJ

MOTION FOR PRETRIAL RELEASE

1. Fatmir Mustafaraj is forty-one (41) years of age having been born March 28, 1972.
2. Fatmir Mustafaraj is self-employed as a contract painter.
3. At all times relevant hereto, Fatmir Mustafaraj has resided at 7024 Frankford Avenue in Philadelphia, Pennsylvania.
4. Mr. Mustafaraj was born in Albania and came to the United States of America in 1995; in 2000 he became an American citizen.
7. Based on knowledge, information, and belief, Fatmir Mustafaraj has no prior arrests, convictions, or contacts with law enforcement in the United States of America.
8. Mr. Mustafaraj has never failed to appear for any court proceeding.
9. At the time of his arrest, law enforcement seized Mr. Mustafaraj's United States Passport.
10. Mr. Mustafaraj is not a danger to the community nor any member of it.
11. Mr. Mustafaraj is presumed innocent of all charges contained in the Indictment.
12. Mr. Mustafaraj is not a risk of flight.
13. Mr. Mustafaraj will honor any and all conditions of bail as established by this Honorable Court including, but not limited to, electronic monitoring.

WHEREFORE, for all of the above stated reasons, it is respectfully requested that this Honorable Court release Mr. Mustafaraj on Pre-Trial Release with any conditions deemed appropriate by United States Pre-Trial Services.

Respectfully submitted,

Richard J. Fuschino, Jr.
Attorney for Fatmir Mustafaraj